



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 17 2002

4APT-ATMB

Michael E. Fogle, Manager
Industrial Source Monitoring Program
Air Protection Branch
Georgia Department of Natural Resources
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Dear Mr. Fogle:

This is in response to your letter dated January 30, 2002, and follow-up letter dated April 11, 2002, regarding alternative monitoring procedures by the Rayonier Corporation, Jesup Mill (Rayonier). The request is being made pursuant to 40 CFR 63.453(m) of the Pulp & Paper MACT standard. More specifically, Rayonier has requested exemptions to the monthly leak detection and repair provisions of 63.453(k) and (l) for system components that are located in unsafe areas not accessible without creating unsafe conditions. In lieu of monthly and annual inspections of the identified unsafe areas, the mill proposes an annual visual inspection with binoculars. Because the requested alternatives are consistent with the requirements in other existing standards, such as the Hazardous Organic NESHAP, and also consistent with similar requests from other mills, Region 4 concurs with Rayonier's request for alternative closed collection and vent system monitoring provisions and approves the following specific provisions:

- Exempt any closed vent system, fixed roof cover, or enclosure from 30-day and annual inspection, monitoring and repair requirements if Rayonier determines that personnel performing the inspection or repair would be exposed to an imminent or potential danger, or the equipment could not be inspected without elevating the inspection personnel more than 6 feet above a support surface. In lieu of leak detection inspections, Rayonier will perform a thorough visual inspection with binoculars annually.
- The Mill's site-specific monitoring plan must identify exempted equipment and describe how the equipment will be inspected and/or repaired during safe-to-inspect and/or repair periods, which must be at least once during each permit term. Also, if "safe-to-inspect" periods exist for any part of the closed vent system, then the inspection should be performed if it had not been performed during the previous calendar month.

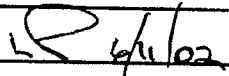

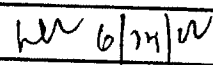
As part of the site-specific monitoring plan, Rayonier must provide their determination on why each piece of equipment, identified for exemption, has been so identified. The equipment determinations will assist your office with implementation of the approved alternative provisions.

If further assistance is needed, please contact Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,

R. Douglas Neeley
Chief
Air Toxics and Monitoring Branch
Air, Pesticides and Toxics
Management Division

LPage.lp.APTMD/IE&GS.06/11/02.rayonier-jesup-lp2.wpd.x29131.bb

Concurrences			
L. Page	K. Mitchell	U. Swann	D. Neeley
 6/1/02	 6/14/02		 6/14/02

Page
Georgia Department of Natural Resources
Environmental Protection Division, Air Protection Branch
4244 International Parkway, Suite 120, Atlanta, Georgia 30340
404/363-7000, Fax: 404/363-7000
Lonice C. Barrett, Commissioner
Harold F. Rehms, Director

April 11, 2002

Mr. Doug Neeley
Chief, Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

Dear Mr. Neeley:

On January 30, 2002, I forwarded an alternate monitoring request from Rayonier, Inc., Jesup, Georgia to you. As requested by Mr. Lee Page of your office, additional information has been received from Rayonier, and is enclosed.

Thank you for your attention to this matter.

Sincerely,



Michael E. Fogle
Manager
Industrial Source Monitoring Program

MEF:lb

Enclosure

RECEIVED

APR 15 2002

AIR AND RADIATION TECHNOLOGY BRANCH
EPA - REGION 4
ATLANTA, GA

Rayonier

April 3, 2001

Performance Fibers

Mr. Mike Fogle
Georgia Environmental Protection Division
Industrial Source Monitoring Program
4244 International Parkway, Suite 120
Atlanta, GA 30354

Jesup Mill

Dear Mr. Fogle:

Enclosed is a petition for the elimination of leak detection test locations subject to testing under MACT I. The following valve/fitting locations are unable to be tested due to safety concerns for the testing personnel. Of the approximately 900 valves and fittings required to be tested, approximately 81 were unsafe or inaccessible to test. The sources are either physically inaccessible, or the area that the valve/fitting is located is one that is unsafe for access while the process is running (i.e. top of the blow heat accumulator).

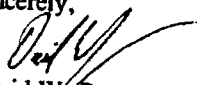
In lieu of leak detection testing, a thorough visual inspection for vapor emissions will be performed with binoculars. This annual inspection will be performed in the winter months, where vapor/steam plumes are more visible, and the focus will be a detailed inspection for telltale plumes at every test point in the table below. The inspectors will get as close to the test point as safety allows and then perform the inspection with binoculars. This external inspection will look for steam/vapor plumes and any other indication that would indicate a loss of seal on a pressurized system or a loss of vacuum at that point on a negative pressure system.

All source numbers refer to the associated P&ID from the WESTON test report (Attached) with field notes from their test period of October 9-12, 2001.

Source	Valve/Fitting #	Reason not tested
A/B Turpentine and Blow Tank Relief Headers	161-164	No access
C Turpentine and Blow Tank Relief Headers	181-184 190 394 444-452	Must climb over chip conveyor Inaccessible Beneath floor
A Accumulator system	40-42 47 48 53-55 8 23 1 45 52	Could not reach from ground/inaccessible Inaccessible Areas unsafe while operating (top of accumulator)
B Accumulator system	90 70-74 58	No access Areas unsafe while operating (top of accumulator)
C Accumulator system	127-130 153-156 158-160	Inaccessible from platform Inaccessible from ground
Foul Condensate/Turpentine system	158-159 523-525 555-558	Inaccessible
NCG system	373-377 379-383	Inaccessible
Stripper system	2-9 29 113-116	Inaccessible

If you have any questions regarding this petition, please contact me at (912) 427-5424.

Sincerely,


David W. Rogers
Senior Environmental Engineer

REGISTERED TO ISO 9002



Certificate No. A2072

1470 Savannah Highway • P. O. Box 2070 • Jesup, GA 31598-2070
Telephone (912) 427-5000

Georgia Department of Natural Resources
Environmental Protection Division, Air Protection Branch
4244 International Parkway, Suite 120, Atlanta, Georgia 30354

404/363-7000
Lonice C. Barrett, Commissioner
Harold F. Reheis, Director

January 30, 2002

Mr. Doug Neeley
Chief, Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

RECEIVED

FEB 01 2002

AIR AND RADIATION TECHNOLOGY BRANCH
EPA - REGION 4
ATLANTA, GA

Dear Mr. Neeley:

Attached is a letter to Mr. Lou Musgrove from the Rayonier Corporation, Jesup, Georgia. This letter details a request for the use of alternative monitoring and inspection procedures for closed collection and vent systems subject to the provisions of 40CFR Part 63, Subpart S. Specifically, the company is requesting modification of the Leak Detection and Repair (LDAR) requirements stated in 40CFR63.453(k) and (l) pertaining to special considerations of circumstances where the monitoring is inherently unsafe or inaccessible.

This request is identical to the one made by International Paper Corporation regarding their facility in Augusta, Georgia which EPA Region IV responded to on December 15, 2000 (letter to Robert F. Dansby from R. Douglas Neeley). Georgia EPD has concluded that the request regarding the unsafe and inaccessible conditions be approved with the stipulation that if "safe-to-inspect" periods exist for any part of the closed vent system, then the inspection should be performed if it had not been performed during the previous calendar month. We feel that this stipulation is necessary to preserve the intent that a proper LDAR program would include inspection at least monthly, if possible.

I look forward to your response, and if I can provide any additional clarification, please advise.

Sincerely,



Michael E. Fogle
Manager
Industrial Source Monitoring Program

MEF:lb

Attachment

cc: Mr. Jimmy Johnston

2/28/02 e-mailed Mike for more information
3/11/02 e-mailed Mike again

Rayonier

Performance Fibers

January 2, 2002

Jesup Mill

Mr. Lou Musgrove
Georgia Environmental Protection Division
Industrial Source Monitoring Program
4244 International Parkway, Suite 120
Atlanta, GA 30354

RECEIVED

JAN 08 2002

AIR PROTECTION BRANCH

Dear Mr. Musgrove:

Enclosed is a petition for the elimination of leak detection test locations subject to testing under MACT I. The following valve/fitting locations are unable to be tested due to safety concerns for the testing personnel. Of the approximately 900 valves and fittings required to be tested, approximately 81 were unsafe or inaccessible to test. The sources are either physically inaccessible, or the area that the valve/fitting is located is one that is unsafe for access while the process is running (i.e. top of the blow heat accumulator). In lieu of leak detection testing, a thorough visual inspection for vapor emissions will be performed with optical instruments. All source numbers refer to the associated P&ID from the WESTON test report (Attached) with field notes from their test period of October 9-12, 2001.

Source	Valve/Fitting #	Reason not tested
A/B Turpentine and Blow Tank Relief Headers	161-164	No access
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Stripper system	2-9 29 113-116	Inaccessible

If you have any questions regarding this petition, please contact me at (912) 427-5424.

Sincerely,


David W. Rogers
Senior Environmental Engineer

Cc: Mike Fogel
Don McHugh

Registered to ISO 9002



Certificate No. A2072

4470 Savannah Highway • P. O. Box 2070 • Jesup, GA 31598-2070
Telephone (912) 375-5000



Richard Taylor
<Richard_Taylor@mail
l.dnr.state.ga.us>

To: Lee Page/R4/USEPA/US@EPA
cc:
Subject: Re: Rayonier

03/21/2002 08:28 AM

Lee; At this time, we have not received written confirmation from Rayonier as to the inspection procedures they intend to follow. It is my understanding that they intend to inspect valves, fittings, etc using binoculars or similar device on the 30 day/annual schedule. When we receive written confirmation, I will forward it to you.

>>> <Page.Lee@epamail.epa.gov> 03/11/02 02:58PM >>>

Mike: I'm double checking to see if you received this

----- Forwarded by Lee Page/R4/USEPA/US on 03/11/2002 02:57 PM -----

Lee Page

To:

mike_fogle@mail.dnr.state.ga.us

02/28/2002

cc:

12:24 PM

Subject: Rayonier

Mike: Regarding the Rayonier mill in Jesup that you forwarded to me by letter dated 1/30/02, they have requested alternative monitoring provisions that are similar to others that I have approved, but they add a new twist. Their letter states "in lieu of leak detection testing, a thorough visual inspection for vapor emissions will be performed with optical instruments"

Are they talking about using a camera for inspecting these unsafe areas ??

The way I read their letter, they want to totally eliminate unsafe areas from the 30 day and annual LDAR requirements, and to replace these requirements with inspections using optical instruments. Would these inspections using optical instruments be done on the same frequency as the LDAR requirements (i.e., 30 day and annual) ??

All other similar requests have been to exempt unsafe areas from the 30 day and annual LDAR requirements, but requires them to inspect the areas at least once each permit term.

Do you agree that 30 day and annual inspections using optical instruments is better than visual inspections at least once every 5 years ??

What are your thoughts on approving their request, but also requiring a visual inspection at least once every 5 years ??

DMR Summary

Permit GA0003620

Permit Name	Version Nmbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
RAYONIER PERFORMANCE FIBERS	0	Major	8/31/04	8/31/04	4/30/06

Version # 0

Outfall 0A0A

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	COMPOS	Daily

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	DAILY AV	DAILY MX
Limit Value	22300	33450
DMR Values		
5/31/09	4111	8649
6/30/09	13308	20312
7/31/09	16331	22218
8/31/09	14366	18575
9/30/09	17825	24074
10/31/09	14870	19200
11/30/09	15312	19554
5/31/10	11581	25397
6/30/10	16310	25565
7/31/10	10854	17159
8/31/10	9069	15563
9/30/10	10448	16472
10/31/10	12163	18057
11/30/10	16572	19550
5/31/11	12538	18781
6/30/11	15509	21912
7/31/11	12839	18508
8/31/11	11760	15236
9/30/11	14800	21321
10/31/11	16655	24035
11/30/11	18048	28841
5/31/12	11216	17957
6/30/12	10044	14973
7/31/12	11027	17101
8/31/12	13493	21125
9/30/12	10115	13780
10/31/12	11042	15703
11/30/12	16430	24087
5/31/13	4140	8033
6/30/13	1824	3936
7/31/13	3708	5438
8/31/13	5145	10617
9/30/13	5376	8220
10/31/13	6688	9447
11/30/13	7746	10827

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 1 / Base

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 1 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	COMPOS	Daily

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	DAILY AV	DAILY MX
Limit Value	32000	48000
DMR Values		
1/31/09	12996	19841
2/28/09	14474	24364
3/31/09	19303	23288
4/30/09	16475	22630
12/31/09	17464	32535
1/31/10	15395	24249
2/28/10	14495	20863
3/31/10	18485	26429
4/30/10	12850	24558
12/31/10	17627	26592
1/31/11	17292	26029
2/28/11	16275	22112
3/31/11	13934	19561
4/30/11	6726	15880
12/31/11	14237	21644
1/31/12	18375	25972
2/29/12	9539	12065
3/31/12	5683	14556
4/30/12	10064	19160
12/31/12	10455	13630
1/31/13	8298	12083
2/28/13	11109	19005
3/31/13	10434	13830
4/30/13	5251	10425
12/31/13	6004	9062
1/31/14		
2/28/14		

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	GRAB	Daily

Limit		
Limit Unit Desc	Standard Units	Standard Units
Statistical Base	MINIMUM	MAXIMUM
Limit Value	6	9
DMR Values		
1/31/09	7.5	8.2
2/28/09	7.5	8.2
3/31/09	7.9	8.3
4/30/09	7.8	8.1
5/31/09	7.7	8.2
6/30/09	8	8.2

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

00400 pH / Location 1 / Season 0 / Base

DMR Values		
7/31/09	8	8.3
8/31/09	7.9	8.3
9/30/09	8	8.2
10/31/09	7.9	8.2
11/30/09	7.9	8.1
12/31/09	7.9	8.1
1/31/10	7.5	8
2/28/10	7.8	7.9
3/31/10	7.7	8
4/30/10	7.9	8.3
5/31/10	7.8	8.2
6/30/10	7.8	8.2
7/31/10	7.9	8.3
8/31/10	7.8	8.1
9/30/10	7.9	8.3
10/31/10	7.7	8.1
11/30/10	7.7	8
12/31/10	7.7	8
1/31/11	7.4	7.9
2/28/11	7.6	8.1
3/31/11	7.6	7.9
4/30/11	7.6	8.2
5/31/11	7.7	8
6/30/11	7.8	8.1
7/31/11	7.8	8.1
8/31/11	7.9	8
9/30/11	7.9	8.1
10/31/11	7.8	8
11/30/11	7.8	8.2
12/31/11	7.7	7.9
1/31/12	7.7	8.4
2/29/12	7.7	7.9
3/31/12	7.8	8.6
4/30/12	7.8	8.2
5/31/12	7.8	8.1
6/30/12	7.8	8.1
7/31/12	7.8	8.2
8/31/12	7.9	8.1
9/30/12	7.9	8.1
10/31/12	7.8	8.1
11/30/12	7.8	7.9
12/31/12	7.9	8.3
1/31/13	7.7	8
2/28/13	7.6	8.1
3/31/13	7.6	7.9
4/30/13	7.7	8.1
5/31/13	7.9	8.4
6/30/13	7.9	8.4
7/31/13	7.7	8.1
8/31/13	7.8	8.2
9/30/13	7.9	8.1
10/31/13	7.9	8.3

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

00400 pH / Location 1 / Season 0 / Base

DMR Values		
11/30/13	7.8	8.2
12/31/13	7.9	8.1
1/31/14		
2/28/14		

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	COMPOS	Daily

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	DAILY AV	DAILY MX
Limit Value	42010	77600
DMR Values		
1/31/09	17299	36779
2/28/09	18567	33471
3/31/09	22321	37689
4/30/09	33302	33302
5/31/09	5798	16813
6/30/09	16953	25367
7/31/09	18532	31301
8/31/09	18241	28497
9/30/09	21288	29270
10/31/09	21941	30757
11/30/09	21069	29866
12/31/09	18404	27724
1/31/10	18113	36838
2/28/10	11831	17837
3/31/10	13974	18631
4/30/10	8108	14759
5/31/10	13493	31952
6/30/10	22661	33592
7/31/10	17156	25201
8/31/10	16073	22369
9/30/10	18348	24085
10/31/10	15239	18886
11/30/10	26113	36404
12/31/10	25375	37461
1/31/11	20884	32239
2/28/11	24423	43672
3/31/11	18088	25978
4/30/11	10837	23980
5/31/11	18471	26765
6/30/11	25467	30612
7/31/11	23554	27340
8/31/11	24085	34516
9/30/11	27716	47054
10/31/11	28461	33331
11/30/11	25725	38366
12/31/11	21533	30447

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

00530 Solids, total suspended / Location 1 / Season 0 / Base

DMR Values		
1/31/12	25136	35666
2/29/12	17934	26887
3/31/12	10867	27005
4/30/12	11084	23300
5/31/12	15039	24108
6/30/12	13719	20183
7/31/12	15764	19606
8/31/12	18339	27118
9/30/12	11166	19058
10/31/12	13392	22598
11/30/12	17097	25428
12/31/12	14439	20195
1/31/13	10002	15825
2/28/13	15273	28227
3/31/13	11064	17654
4/30/13	7466	13008
5/31/13	6121	11683
6/30/13	1947	3616
7/31/13	4076	6504
8/31/13	5172	19588
9/30/13	6808	10345
10/31/13	9731	14677
11/30/13	7996	14633
12/31/13	6064	10136
1/31/14		
2/28/14		

01290 Color [admi units] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	COMPOS	Weekly

Limit	
Limit Unit Desc	Color - Admi Units
Statistical Base	MAXIMUM
Limit Value	
DMR Values	
1/31/09	2255
2/28/09	1974
3/31/09	1608
4/30/09	1523
5/31/09	1194
6/30/09	1619
7/31/09	1749
8/31/09	1516
9/30/09	1447
10/31/09	1467
11/30/09	1480
12/31/09	1317
1/31/10	1288
2/28/10	1188

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

01290 Color [admi units] / Location 1 / Season 0 / Base

DMR Values	
3/31/10	1283
4/30/10	1410
5/31/10	1474
6/30/10	1324
7/31/10	1349
8/31/10	1368
9/30/10	1302
10/31/10	1318
11/30/10	1286
12/31/10	1478
1/31/11	1402
2/28/11	1325
3/31/11	1362
4/30/11	1650
5/31/11	1678
6/30/11	1619
7/31/11	1489
8/31/11	1372
9/30/11	1435
10/31/11	1485
11/30/11	1466
12/31/11	1364
1/31/12	1559
2/29/12	1394
3/31/12	1740
4/30/12	1338
5/31/12	1513
6/30/12	1312
7/31/12	1460
8/31/12	1449
9/30/12	1241
10/31/12	1222
11/30/12	1320
12/31/12	1291
1/31/13	1194
2/28/13	1132
3/31/13	1115
4/30/13	1015
5/31/13	1712
6/30/13	1117
7/31/13	808
8/31/13	866
9/30/13	744
10/31/13	758
11/30/13	858
12/31/13	885
1/31/14	
2/28/14	

34675 2,3,7,8-Tetrachlorodibenzo-p-dioxin / Location 1 / Season 0 / Base

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

34675 2,3,7,8-Tetrachlorodibenzo-p-dioxin / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	COMPOS	Quarterly

Limit	
Limit Unit Desc	Micrograms per Lite
Statistical Base	DAILY AV
Limit Value	.000153
DMR Values	
3/31/09	.0000065
6/30/09	.0000028
9/30/09	.0000028
12/31/09	.0000084
3/31/10	.0000038
6/30/10	.0000053
9/30/10	.0000026
12/31/10	.0000011
3/31/11	.000009
6/30/11	.0000081
9/30/11	.0000039
12/31/11	.0000017
3/31/12	.0000039
6/30/12	.0000008
9/30/12	.00000027
12/31/12	.00000097
3/31/13	.00000091
6/30/13	.00000074
9/30/13	.00000029
12/31/13	.00000031

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
8/31/04	4/30/06	CONTIN	

Limit	
Limit Unit Desc	Million Gallons per l
Statistical Base	DAILY AV
Limit Value	
DMR Values	
1/31/09	53.5
2/28/09	55.9
3/31/09	58.1
4/30/09	60.5
5/31/09	39.8
6/30/09	63
7/31/09	58
8/31/09	58.9
9/30/09	56.8
10/31/09	56.1
11/30/09	54.8
12/31/09	58.2
1/31/10	58.3

DMR Summary

Permit GA0003620

Version # 0

Outfall 0A0A

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

DMR Values	
2/28/10	56.4
3/31/10	55.4
4/30/10	35.1
5/31/10	51.9
6/30/10	59
7/31/10	55.1
8/31/10	55.9
9/30/10	53.9
10/31/10	54.8
11/30/10	55.8
12/31/10	54.8
1/31/11	57.3
2/28/11	56.3
3/31/11	52
4/30/11	38.1
5/31/11	54.4
6/30/11	54
7/31/11	53.5
8/31/11	56.2
9/30/11	57.1
10/31/11	54.6
11/30/11	52.4
12/31/11	54.1
1/31/12	50.8
2/29/12	50.6
3/31/12	36.7
4/30/12	51.6
5/31/12	55.9
6/30/12	52.9
7/31/12	51.4
8/31/12	54.7
9/30/12	50.2
10/31/12	47.8
11/30/12	51.7
12/31/12	49.8
1/31/13	47.1
2/28/13	51.1
3/31/13	46.7
4/30/13	45.3
5/31/13	30.7
6/30/13	36.1
7/31/13	45.6
8/31/13	52.4
9/30/13	49.2
10/31/13	48.4
11/30/13	48.3
12/31/13	48.4
1/31/14	
2/28/14	